Comments on Item 4: “Rural Cluster Development and Prime Agricultural Soil Amendments” (June 16, 2020)

Summary

1. SRL strongly supports this BMI and urges its adoption.
2. This is an urgent and time sensitive issue that should be prioritized.
3. The details will be critical – SRL will be following this with great attention.
4. Hortatory language should be avoided in regulating by-right development.
5. Loudoun’s rural cluster zoning densities should be aligned with neighboring counties.

SRL Supports the BMI

SRL enthusiastically welcomes this Item and extends our heartfelt gratitude to supervisors Randall and Buffington for their leadership in moving it forward.

- We hope the Board will approve this Initiative this evening and begin implementation as quickly as possible.
- We know other supervisors are also interested in this initiative and appreciate their support as well.
- We have submitted this statement and a few charts by email and hope you will be able to take a moment to review them.

Rural Preservation is Important for the Entire County

This Item is important to all the citizens of Loudoun County, both east and west.

The close proximity of urban amenities and rural countryside is unique and enhances the livelihoods and the quality of life of all Loudoun citizens.

- Our rural areas are a key feature of Loudoun’s marketing brand and a major selling point for local businesses, including real estate businesses.
- They help us to attract dynamic firms and a talented workforce.
- They help to hold down County tax rates and put a brake on our growing traffic congestion problems.
- They allow us to retain local capacity to provide high quality food products, a need highlighted by the ongoing pandemic.

The Issue is Urgent and Time Sensitive

Last December, the Rural Economic Development Commission wrote the Board to express growing concern about the impact that the ongoing loss of farmland has on the local economy.
We share their sense of urgency.

**In this context, we strongly agree that County staff should prioritize work on a ZOAM, DOAM and other regulatory changes needed to preserve farmland.**

- Based on the most recent trends, we continue to lose an additional 4 square miles of farmland every year.
- This is a highly time sensitive issue that must be addressed as urgently as possible.

**Specific Priorities**

We support the list of action items on pages 2 and 3 of the Item, in particular:

- **#2:** the majority of the prime farmland should be preserved in “rural economy lots;”
- **#6:** those lots should be large and contiguous; and
- **#9:** just as in our urban areas, rural developments should not exceed the capacity of our public road systems.

Of course, the actual impact of all these measures will depend on many critical details – particularly the question of how much prime farmland will be protected.

- We will be following the progress of this work with great attention.
- As one point of reference, we would encourage Board members and staff to review Section 2-406.4 of Fauquier County’s Zoning Ordinance, which provides strong protections for prime soils and other natural resources.

**Enforceable Regulations Needed for By Right Rural Development**

As Staff work to implement the Initiative, we encourage caution with the use of the words “guidance,” “encourage” and “consider” in the list of potential actions.

- It is important to remember that cluster subdivisions are permitted “by right” in our rural areas.
- Unlike in the urban and suburban policy areas, supervisors do not have the opportunity to review individual development applications for consistency with County policy.
- As the Item notes, staff have been unable so far to implement the County’s longstanding policy of preserving farmland.

The experience to date should be a clear reminder that we cannot rely on hortatory language to achieve the County’s policy goals.

**An Additional Component: Residential Density**

Finally, we believe there is one additional issue that must be addressed.

- A recent study by the American Farmlands Trust found that proximity to residential subdivisions, even low-density ones, increases the chances that farmland will be lost.
Currently, Loudoun’s Zoning Ordinance allows 2-3 times more residences to be built in our Rural North (AR-1) than is permitted in Clarke, Fauquier, and Prince William counties’ rural areas. This is illustrated on the third slide of our written submission.

In the context of the AFT study, these differences in zoning densities suggest that Loudoun is more willing than other counties to accept the loss of our farmland.

We do not believe that is the policy intent of this Board or the wish of Loudoun citizens in general.

Therefore, we encourage the Board to take additional action to adjust cluster zoning densities to more closely match those of our surrounding counties.

Thank you again for your efforts to preserve Loudoun’s unique mix of land uses and its exceptional quality of life.